

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

TIMOTHY BOZUNG, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CHRISTIANBOOK, LLC,

Defendant.

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)
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) Hon. Paul L. Maloney
)
) Case No. 22-cv-00304-PLM-SJB
)
)

) **STIPULATION TO EXTEND**
) **DEFENDANT'S TIME TO FILE AN**
) **ANSWER OR OTHER**
) **RESPONSIVE PLEADINGS**
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**STIPULATION TO EXTEND THE DEADLINE TO FILE
ANSWER OR OTHER RESPONSIVE PLEADINGS**

Plaintiff, Timothy Bozung, and Defendant, Christianbook, LLC (together, “the Parties”), through their respective counsel, hereby stipulate to extend the time for Defendant to respond to Plaintiff’s Complaint by thirty (30) days. In support, Plaintiff and Defendant jointly state:

1. Plaintiff filed his Complaint on March 31, 2022.
2. A summons was issued on April 14, 2022, and service was effectuated was on or about April 20, 2022, and Defendant waives any potential objections to service of process in this matter.
3. Defendant’s current answer deadline is on or about May 11, 2022.
4. Counsel for Plaintiff and Defendant have stipulated to a 30-day extension of time, to June 10, 2022.
5. This modest extension of time will provide Defendant with time to engage local counsel and conduct an initial factual investigation.
6. The Parties make this request in good faith and not for purposes of delay.
7. The requested relief will neither prejudice Plaintiff nor impede the efficient administration of this case.
8. A proposed order granting this Stipulation is attached as Exhibit A.

Accordingly, the Parties jointly move this Court to adjourn the Defendant’s deadline to respond to Plaintiff’s complaint to June 10, 2022.

SO STIPULATED,

May 3, 2022

/s/ E. Powell Miller

E. Powell Miller (P39487)

Sharon S. Almonrode (P33938)

THE MILLER LAW FIRM, P.C.

950 W University Drive, Ste 300

/s/ Jennifer Chunias

Jennifer Chunias (*admission application forthcoming*)

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on May 3, 2022, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system, which caused it to be served on all counsel of record.

/s/ E. Powell Miller

E. Powell Miller (P39487)

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